

Bartek Ingredients Inc – Provincial Air & Noise Permit Application

How to prepare and submit comments via the Environmental Registry of Ontario

This information sheet provides all of the basic information you need to prepare and submit comments on Bartek Ingredients Inc’s application to amend its provincial ‘Environmental Compliance Approval’ (ECA) for air & noise emissions from the company’s facility located at 421 Seaman Street in Stoney Creek. Bartek Ingredients produces food-grade malic and fumaric acid at this facility.

Under Ontario’s *Environmental Bill of Rights*, every Ontarian has the right to be informed of and to comment on applications with the potential to impact on the environment. As a result, Bartek’s application to amend its air permit has been posted to the Environmental Registry of Ontario (ERO) for public comment. The Bartek posting can be viewed on the registry by [clicking here](#) or searching the registry for ERO Posting Number 019-2523. According to the registry posting, the company has applied to amend its existing ECA (air & noise) to ‘include the addition of new, or historically unapproved, sources for all emissions’.

We requested that the provincial Ministry of Environment provide us with the documents to support the company’s application to amend this permit. Unfortunately, these detailed technical documents were too large to upload to our website but we are happy to email them to anyone who is interested in viewing them. Send your request for these documents to Lynda at lukasik@environmenthamilton.org. We have also reviewed these documents and have pulled out key information that is summarized below.

Air Pollution Emissions

To apply to amend its air & noise permit, the company is required to do an ‘Emission Summary Dispersion Model’ – a computer air modelling exercise designed to assess air pollution emissions from the facility when operating at maximum capacity. The modelling done for Bartek’s facility shows that the company is in compliance with Ontario’s maximum allowable emission levels for pollutants generated at the site. But it is worth noting that modelling shows that one pollutant is close to the maximum allowable level at 76% - and that is *suspended particulate matter*. It is also worth noting that nitrogen oxides are at almost 60% of the maximum level, as are flourides. Sodium hydroxide is also notable at 44% of the maximum allowable emission levels. Note that these are all modelled – not monitored – results. Actual measurement of contaminant levels in the air would confirm whether these modelled values reflect reality.

Table 1: Emission Summary Table

Contaminant Name	Contaminant CAS #	Total Facility Emission Rate (g/s)	Air Dispersion Model Used	Maximum POI Concentration ($\mu\text{g}/\text{m}^3$) ¹	Averaging Period ¹ (hours)	Ministry POI Limit ($\mu\text{g}/\text{m}^3$)	Limiting Effect	Source	Percentage of POI Limit (%)
Nitrogen Oxides (facility operations excluding generator testing) ²	10102-44-0	8.06E-01	AERMOD v19191	233	1	400	Health	Standard	58%
		8.06E-01		112	24	200	Health	Standard	56%
Nitrogen Oxides (monthly generator testing) ⁵	10102-44-0	9.31E-01		1,017	0.5	1,880	Emergency Generator Checklist		54%
Suspended Particulate Matter	N/A	2.70E-01		91	24	120	Visibility	Standard	76%
Fumaric Acid ²	110-17-8	2.84E-02		16.9	24	6.25	Health	SL-JSL	Note 3
Maleic Anhydride	108-31-6	9.01E-03		2.69	24	30	Health	Guideline	9.0%
Malic Acid ²	6915-15-7	1.07E-01		68	24	12.5	Health	SL-JSL	Note 3
Sodium Hydroxide	1310-73-2	2.58E-03		4.4	24	10	Corrosion	Guideline	44%
Carbon	7440-44-0	4.88E-04		0.50	24	1.75	Health	SL-JSL	28%
Chromium	7440-47-3	1.57E-04		0.16	24	0.5	Health	Standard	32%
Potassium oxide	12136-45-7	4.92E-04		0.50	24	1.5	Health	SL-PA	33%
Fluorides (as HF)	7446-39-3	4.95E-04		0.50	24	0.86	Vegetation	B1	59%

Notes:

¹ For substances with 30 min averaging standards, the modelled 1-hr results were converted to 30min by applying a 1.2 multiplier, in accordance with the ADMGO and section 17 of O. Reg. 419/05.

² With Meteorological data anomalies removed as per the ADMGO.

³ Maximum GLC Requested

⁴ SL-PA: Previously Accepted Screening Level; SL-MD: Ministry-derived Screening Level; SL-JSL: Jurisdictional Screening Level

⁵ Only one generator is tested at a time, worst-case POI concentration is shown

When preparing your comments on air pollution impacts from the Bartek facility consider these issues:

- It is worth **questioning some of the modelled air emission results summarized in the chart above**. Levels of suspended particulate matter coming from the facility are modelled at 76% of the Ministry of Environment

maximum allowable emission level. The modelled levels are very close to the actual limit, warranting a call for actual monitoring to determine how high these levels really are. The nitrogen oxide levels are modelled at 58% of the limit; it is also worth calling for actual testing of nitrogen oxides. Finally, the fluoride levels are modelled at 59% - also high enough to warrant a call for confirmation of actual levels with monitoring.

Particulate pollution can end up falling out on nearby properties (think about dusty patio furniture and homes). Some particulate is small enough that it can create respiratory health issues. Referred to as PM2.5 or particulate matter that is 2.5 microns in diameter or smaller – this fine dust is a confirmed cause of lung cancer in humans. It is important to ask the Ministry to require the company to monitor for respirable particulate – not just ‘total suspended particulate’ which includes all particulate sizes.

-It is worth **requesting that the provincial Ministry of Environment require the company to actually MONITOR (measure) air pollution levels from the facility rather than just estimating using a computer model.** Nearby residents need assurances that the facility is actually operating within the allowable air emission limits.

Noise Impacts As part of this amendment application, the company was also required to assess noise impacts from the facility – a process that involves evaluating all individual sources of noise to determine whether additional actions are required to operate the facility within provincial noise guidelines. The company hired a consultant to undertake the assessment, and the assessment report concluded that the ‘noise predictions for the existing equipment show that the sound levels are above the MECP sound level limits’ and further ‘(T)o address this, a Noise Abatement Action Plan (NAAP) has been developed for the installation of a discharge silencer for two of the Dust Blowers 3 and 4’. Based on the assessment, implementation of the Noise Abatement Action Plan – including the installation of this noise abatement equipment, will ensure that the company is in compliance with provincial noise guidelines.

Submitting Your Comments The easiest way to submit your comments on the company’s application is on-line via the Environmental Registry of Ontario. Again – the link to this posting can be accessed by [clicking here](#) or going to the on-line registry (www.ero.ontario.ca) and searching the registry for ERO Posting Number 019-2523. You can also snail mail your comments to the address in the posting. Once you are on the registry, you will see a blue box on the left hand side labelled ‘Submit A Comment’ (circled in red in the picture below). Click on that box to access the comment form and fill out the form. The comment form includes a text box where you can write your comments. We advise that you draft up your comments off-line in a document and then cut and paste your comments into the comment form text box when you are ready to do so. Please note that the **COMMENT DEADLINE for this proposal is November 20th** ! Comments must be submitted by 11:59 pm that day. If you have any questions/ need any help with preparing and submitting your comments, feel free to contact Lynda at Environment Hamilton at llukasik@environmenthamilton.org.

Bartek Ingredients Inc.

Instrument type: [Environmental Compliance Approval \(air\)](#)

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Ministry reference number	4812-BRBQJ2
Notice type	Instrument
Act	Environmental Protection Act, R.S.O. 1990
Posted by	Ministry of the Environment, Conservation and Parks
Notice stage	Proposal
Proposal posted	October 6, 2020
Comment period	October 6, 2020 - November 20, 2020 (45 days) Open
Last updated	October 6, 2020

This consultation closes at
11:59 p.m. on:

November 20, 2020

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Proposal summary

This proposal is for an Environmental Compliance Approval with Limited Operational Flexibility (Air & Noise) for Bartek Ingredients Inc. for a chemical manufacturing facility, including the production of malic and fumaric acid, located in Stoney Creek, City of Hamilton, Ontario.

